

ANDRES TREVINO
also known as "Bollo Dodge"
also known as "Pollo"

LUIS EDUARDO VARGAS
also known as "Wicho"
OMAR GARCIA
and
ALFREDO CANO

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more of a mixture or substance containing a detectable amount of cocaine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

Count Two

From on or about March 17, 2016 through on or about October 11, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

LUIS EDUARDO VARGAS
also known as "Wicho"
OMAR GARCIA
ELSA ALEMAN
FIDEL SALDANA
also known as "Mofles"

EMILIO DE LA GARZA
also known as "D-Lo"

ALFREDO CANO
JOSE RUBEN
RUVALCABA-VALDEZ also known as
"Chinolas"
EZEQUIEL CHAVEZ
CRISTIAN JOSUE GARZA

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to knowingly possess a firearm, during and in relation to a drug trafficking offense and crime of violence for which they may be prosecuted in a court of the United States, namely, Conspiracy to Possess with Intent to Distribute a Controlled Substance, to wit a mixture or substance containing a detectable amount of cocaine and marijuana, in violation of Title 21 United States Code Sections 841 and 846, Hobbs Act Robbery in violation of Title 18 United States Code Section 1951(a), and Carjacking in violation of Title 18 United States Code Section 2119.

All in violation of Title 18, United States Code, Section 924(o).

Count Three

On or about July 4, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

LUIS EDUARDO VARGAS
also known as "Wicho"

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

Count Four

On or about July 4, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

LUIS EDUARDO VARGAS
also known as "Wicho"

did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery and attempt to obstruct, delay, and affect commerce and the

movement of articles and commodities in commerce by robbery, in that the defendant did unlawfully take and attempted to take controlled substances and drug proceeds from individuals.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

Count Five

On or about July 4, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

LUIS EDUARDO VARGAS
also known as "Wicho"

aiding and abetting others, did knowingly carry a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, Hobbs Act Robbery in violation of Title 18 United States Code Section 1951(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(i) and 2.

Count Six

On or about December 4, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

OMAR GARCIA
ELSA ALEMAN
FIDEL SALDANA
also known as "Mofles"
CRISTIAN JOSUE GARZA
and

aiding and abetting others did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery and attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that the defendant did unlawfully take and attempted to take controlled substances and drug proceeds from individuals.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

Count Seven

On or about December 4, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**OMAR GARCIA
CRISTIAN JOSUE GARZA
and**

aiding and abetting others did knowingly carry and brandish a firearm, during and in relation to a drug trafficking offense and crime of violence for which they may be prosecuted in a court of the United States, namely, Conspiracy to Possess with Intent to Distribute a Controlled Substance in violation of Title 21 United States Code Sections 841 and 846 and Hobbs Act Robbery in violation of Title 18 United States Code Section 1951(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

Count Eight

On or about December 4, 2017, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**OMAR GARCIA
ELSA ALEMAN
FIDEL SALDANA
also known as "Mofles"
and**

aiding and abetting others did knowingly carry and brandish a firearm, during and in relation to a drug trafficking offense and crime of violence for which they may be prosecuted in a court of the United States, namely, Conspiracy to Possess with Intent to Distribute a Controlled Substance in violation of Title 21 United States Code Sections 841 and 846 and Hobbs Act Robbery in violation of Title 18 United States Code Section 1951(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

Count Nine

On or about October 20, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

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knowingly having been convicted of a crime punishable by imprisonment for a term exceeding one year, namely, Possession of Marijuana in an Amount Greater than Four Ounces but Less Five

Pounds in Cause Number CR-4798-17-D in the 206th Judicial District Court in Hidalgo County, Texas on January 26, 2018, did knowingly and unlawfully possess in and affecting interstate and foreign commerce a firearm, namely, a Colt pistol.

In violation of Title 18, United States Code, Sections 922(g)(1) and 924(a)(2).

Count Ten

On or about October 20, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

**and
CRISTIAN JOSUE GARZA**

did fraudulently and knowingly export and send from the United States, or attempt to export and send from the United States, any merchandise, article, or object, to wit:; a Colt, Model Government, 9mm caliber pistol; and a Colt, Model Government, .45 caliber pistol contrary to Title 22, United States Code, Sections 2778(b)(2) and (c) and Title 22, Code of Federal Regulations, Sections 121.1, 123.1, 127.1, and 127.3, a law and regulation of the United States.

In violation of Title 18, United States Code, Sections 554(a) and 2.

Count Eleven

On or about November 18, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

FIDEL SALDANA
also known as "Mofles"
and

did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery and attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that the defendants did unlawfully take and attempted to take undocumented alien smuggling proceeds from individuals.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

Count Twelve

On or about November 18, 2018, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

FIDEL SALDANA
also known as "Mofles"
and

aiding and abetting others, did knowingly carry and brandish a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, Hobbs Act Robbery in violation of Title 18 United States Code Section 1951(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

Count Thirteen

On or about May 5, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JOSE RUBEN RUVALCABA-VALDEZ
also known as "Chinolas"
EZEQUIEL CHAVEZ

and

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 100 kilograms or more of a mixture or substance containing a detectable amount of marijuana, a Schedule I controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(B).

Count Fourteen

On or about May 5, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JOSE RUBEN RUVALCABA-VALDEZ
also known as "Chinolas"
EZEQUIEL CHAVEZ
and

did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery and attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that the defendant did unlawfully take and attempted to take controlled substances from individuals.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

Count Fifteen

On or about May 5, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

JOSE RUBEN RUVALCABA-VALDEZ
also known as "Chinolas"
EZEQUIEL CHAVEZ
and

aiding and abetting each other, did knowingly carry and brandish a firearm, during and in relation to a drug trafficking offense and crime of violence for which they may be prosecuted in a court of the United States, namely, Conspiracy to Possess with Intent to Distribute a Controlled Substance in violation of Title 21 United States Code Sections 841 and 846 and Hobbs Act Robbery in violation of Title 18 United States Code Section 1951(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

Count Sixteen

On or about May 10, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

EMILIO DE LA GARZA
also known as "D-Lo"
and

did unlawfully obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery and attempt to obstruct, delay, and affect commerce and the movement of articles and commodities in commerce by robbery, in that the defendant did unlawfully take and attempted to take controlled substances and drug proceeds from individuals.

In violation of Title 18, United States Code, Sections 1951(a) and 2.

Count Seventeen

On or about May 10, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

EMILIO DE LA GARZA
also known as "D-Lo"
and

aiding and abetting others, did knowingly carry and brandish a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, Hobbs Act Robbery in violation of Title 18 United States Code Section 1951(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

Count Eighteen

On or about September 15, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JOSE RUBEN RUVALCABA-VALDEZ
also known as "Chinolas"

took and attempted to take a motor vehicle, namely, a Kia Soul, that had been transported, shipped, and received in interstate and foreign commerce from and in the presence of an individual by force, violence, and intimidation, with the intent to cause death and serious bodily harm.

In violation of Title 18, United States Code, Sections 2119 and 2.

Count Nineteen

On or about September 15, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

JOSE RUBEN RUVALCABA-VALDEZ
also known as "Chinolas"

aiding and abetting others, did knowingly carry and brandish a firearm, during and in relation to a crime of violence for which they may be prosecuted in a court of the United States, namely, Conspiracy to Possess with Intent to Distribute a Controlled Substance in violation of Title 21 United States Code Sections 841 and 846 and Carjacking in violation of Title 18 United States Code Section 1951(a).

All in violation of Title 18, United States Code, Sections 924(c)(1)(A)(ii) and 2.

Count Twenty

From on or about June 1, 2017 through on or about February 28, 2019, in the Southern District of Texas and within the jurisdiction of the Court, defendants,

ANDRES TREVINO
also known as "Bollo Dodge"
also known as "Pollo"
and
PEDRO RUBIO

did knowingly and intentionally conspire and agree together and with other persons known and unknown to the Grand Jurors, to possess with intent to distribute a controlled substance. The controlled substance involved was 500 grams or more of a mixture or substance containing a detectable amount of methamphetamine, a Schedule II controlled substance.

In violation of Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(A).

A TRUE BILL

FOREPERSON

RYAN K. PATRICK
UNITED STATES ATTORNEY



ASSISTANT UNITED STATES ATTORNEY